

JAP:JRL

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

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UNITED STATES OF AMERICA

C O M P L A I N T

- against -

(21 U.S.C. §§ 952(a)
and 960)

JACKY MAULANGE,

Defendant.

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EASTERN DISTRICT OF NEW YORK, SS:

ERIC PAUTA, being duly sworn, deposes and states that he is a Special Agent of the United States Department of Homeland Security, Homeland Security Investigations, duly appointed according to law and acting as such.

Upon information and belief, on or about June 27, 2012, 2012, within the Eastern District of New York and elsewhere, defendant JACKY MAULANGE did knowingly, intentionally and unlawfully import into the United States from a place outside thereof a substance containing cocaine, a Schedule II controlled substance.

(Title 21, United States Code, Sections 952(a) and 960).

The source of your deponent's information and the grounds for his belief are as follows:¹

1. On or about June 27, 2012, JACKY MAULANGE arrived at John F. Kennedy International Airport ("J.F.K. Airport") in Queens, New York, aboard American Airlines flight 896 from Port au Prince, Haiti.

2. Defendant JACKY MAULANGE was selected for a Customs and Border Protection ("CBP") examination. The defendant stated in sum and substance that an "American Tourister" bag, a "Bellini" rollerbag and a "Wisdom" laptop bag were his and that the contents of the bags were his. During examination of the "American Tourister" bag, a CBP officer noticed that the bag was unusually thick. A probe of the bottom of the bag revealed a white powdery substance, which field-tested positive for the presence of cocaine. Defendant JACKY MAULANGE was then placed under arrest.

3. The total approximate gross weight of the cocaine found in defendant JACKY MAULANGE's suitcase is 3.417 kilograms.

^{1/} Because the purpose of this Complaint is to set forth only those facts necessary to establish probable cause, I have not described all the relevant facts and circumstances of which I am aware.

WHEREFORE, your deponent respectfully requests that
defendant JACKY MAULANGE be dealt with according to law.



ERIC PAUTA
Special Agent, HSI

Sworn to before me this
28th day of June 2012

DRELSKY
JGE
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